

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MARLOW HENRY, on behalf of the BSC  
Ventures Holdings, Inc. Employee Stock  
Ownership Plan, and on behalf of a class of all  
other persons similarly situated,

Plaintiff,

v.

WILMINGTON TRUST, N.A., BRIAN C. SASS,  
and E. STOCKTON CROFT IV,

Defendants.

C.A. No. 19-1925-JLH

**PLAINTIFF’S MOTION FOR CLASS CERTIFICATION**

Plaintiff Marlow Henry, by and through his attorneys, respectfully moves this Court for an order (a) certifying this Action as a Class Action pursuant to Fed. R. Civ. P. 23; (b) appointing Plaintiff’s counsel as Class Counsel; and (c) appointing Plaintiff Marlow Henry as Class Representative.<sup>1</sup>

Plaintiff’s Motion is based on the accompanying Opening Brief in Support of the Motion for Class Certification, the Declaration of Daniel Feinberg and Exhibit thereto, the Declaration of Gregory Porter and Exhibits thereto, all other pleadings and matters of records, and such additional evidence or argument as may be presented.

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<sup>1</sup> Pursuant to D. Del. LR 7.1.1, the undersigned states that defendants would not agree to the relief requested through this motion.

Dated: December 23, 2024

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